

DOCKET FILE ~~EX PARTE~~ ORIGINAL LATE FILED

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ORIGINAL

VIA COURIER

EX PARTE

July 2, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FILED/ACCEPTED
JUL - 2 2008
Federal Communications Commission
Office of the Secretary

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant
to 47 U.S.C. § 160(c) in the Seattle Metropolitan Statistical Area,
WC Docket No. 07-97*

Dear Ms. Dortch:

Qwest Corporation hereby submits the attached *ex parte* and request for confidential treatment (pursuant to the Second Protective Order) of highly confidential information included in the *ex parte*, in the above-captioned proceeding.

One copy of the non-redacted version is being submitted; and two copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the *ex parte* are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information above.

Sincerely,

/s/ Melissa E. Newman

Attachments

File of Qwest's note 041
ELIADCE

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July 2, 2008

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cc: (via e-mail)

Denise Coca (denise.coca@fcc.gov)

Jeremy Miller (Jeremy.miller@fcc.gov)

Tim Stelzig (tim.stelzig@fcc.gov)

Gary Remondino (two hard copies of the non-redacted version & via
gary.remondino@fcc.gov)

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Qwest
1801 California Street, 10th Floor
Denver, Colorado 80202
Phone 303-383-6653
Facsimile 303-896-1107

Daphne E. Butler
Corporate Counsel

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EX PARTE

July 2, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant
to 47 U.S.C. § 160(c) in the Seattle Metropolitan Statistical Area,*
WC Docket No. 07-97

Dear Ms. Dortch:

Qwest Corporation ("Qwest") hereby requests highly confidential treatment of certain information included in the associated *ex parte*. The highly confidential information includes: retail access lines in the Seattle Metropolitan Statistical Area ("MSA") broken out by wire center, and quantities of wholesale services purchased by competitive local exchange carriers in the Seattle MSA, broken out by wire center.

The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the Second Protective Order, the highly confidential information is marked **HIGHLY CONFIDENTIAL – SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**. Pursuant to the Second Protective Order, Qwest requests that the non-redacted version of this *ex parte* (containing highly confidential information) be withheld from public inspection.

Qwest considers this highly confidential information as being extremely competitively-sensitive in nature. This type of information is "not routinely available for public inspection" pursuant to both Federal Communications Commission ("Commission") rules 47 C.F.R. §§ 0.457(d) and 0.459 (as Qwest explained and for which it provided legal justification in its Request for Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance).

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Qwest is simultaneously submitting, under separate covers, a non-redacted and a redacted version of the associated *ex parte*. The redacted version of the *ex parte* is marked **"REDACTED - FOR PUBLIC INSPECTION"**. Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the highly confidential information has been omitted. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

Attachment

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Phone 303-383-6653
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Daphne E. Butler
Corporate Counsel

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EX PARTE

July 2, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
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Re: *In the Matter of Petition of Qwest Corporation for Forbearance Pursuant
to 47 U.S.C. § 160(c) in the Seattle Metropolitan Statistical Area,
WC Docket No. 07-97*

Dear Ms. Dortch:

Qwest Corporation ("Qwest") files the attached updated data to update the retail access line counts and wholesale services data in the record for the Seattle Metropolitan Statistical Area ("MSA").¹ Qwest provides retail line counts by wire center, updating the data provided on May 2, 2008. The column headed "Business Lines" on the attached chart corresponds to the column headed "Total Business Lines" on the chart filed on May 2. Accordingly, the column headed "Total Qwest Retail Access Lines" on the attached chart corresponds to the column with that title on the chart filed on May 2, 2008. Qwest has experienced even further losses across all categories of retail access lines in the Seattle MSA.

Qwest also updates Highly Confidential Exhibit 2, which provides the total quantity of Qwest wholesale services purchased by competitive local exchange carriers ("CLECs") in each Seattle MSA wire center. The attached update to Highly Confidential Exhibit 2 demonstrates that the number of CLEC lines provided in the Seattle MSA via Qwest's wholesale products has increased between December 2007 and May 2008. Qwest filed the December 2007 data on March 5, 2008.

¹ Per Qwest's *ex parte* of June 13, 2008, we are specifically requesting relief for the 26 Qwest wire centers located within the boundaries of the Seattle-Bellevue-Everett Metropolitan Division.

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Respectfully submitted,

/s/ Daphne E. Butler

Attachments

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**Qwest Retail Access Lines in Service as of May 2008
Seattle MSA**

*****BEGIN HIGHLY CONFIDENTIAL*****

Wire Center	CLLI Code	Residence Lines	Business Lines	Public Lines	Total Qwest Retail Access Lines
		A	B	C	A + B + C
AUBURN	AUBNWA01				
BELLEVUE GLENCOURT	BLLVWAGL				
BELLEVUE SHERWOOD	BLLVWASH				
BLACK DIAMOND	BDMDWA01				
DES MOINES	DESMWA01				
ENUMCLAW	ENMCWA01				
FEDERAL WAY	FDWYWA01				
ISSAQUAH	ISQHWAEX				
KENT MERIDIAN	KENTWAME				
KENT O'BRIEN	KENTWAOB				
KENT ULRICK	KENTWA01				
MAPLE VALLEY	MPVYWAMV				
MERCER ISLAND	MRISWA01				
RENTON	RNTNWA01				
SEATTLE ATWATER	STTLWA05				
SEATTLE CAMPUS	STTLWACA				
SEATTLE CHERRY	STTLWACH				
SEATTLE DUMWAMISH	STTLWADU				
SEATTLE EAST	STTLWA03				
SEATTLE ELLIOTT	STTLWAEI				
SEATTLE EMERSON	STTLWA04				
SEATTLE LAKEVIEW	STTLWALA				
SEATTLE MAIN	STTLWA06				
SEATTLE PARKWAY	STTLWAPA				

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SEATTLE SUNSET	STTLWASU				
SEATTLE WEST	STTLWAVE				
Seattle MSA Totals					

END HIGHLY CONFIDENTIAL

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SEATTLE MSA
CLEC LINES PROVIDED VIA QWEST WHOLESALE PRODUCTS
As of May 2008

Wire Center	CLLI#	CLEC BUSINESS LINES					CLEC RESIDENCE LINES			BUSINESS + RESIDENCE				
		UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total	Platform-Based ²	Resale	Total	UNE-L ¹	EEL ¹	Platform-Based ²	Resale	Total
		(May '08)	(May '08)	(May '08)	(May '08)	(Sum of Col. A thru Col. D)	(May '08)	(May '08)	(Sum of Col. F + Col. G)	(May '08)	(May '08)	(May '08)	(May '08)	(Sum of Col. I thru Col. L)
		A	B	C	D	E	F	G	H	I = A	J = B	K = C + F	L = D + G	M
AUBURN	AUBNWA01													
BELLEVUE GLENCOURT	BLLVWAGL													
BELLEVUE SHERWOOD	BLLVWASH													
BLACK DIAMOND	BDMDWA01													
DES MOINES	DESMWA01													
ENUMCLAW	ENMCWA01													
FEDERAL WAY	FDWYWA01													
ISSAQUAH	ISQHWAEX													
KENT MERIDIAN	KENTWAME													
KENT O BRIEN	KENTWAOB													
KENT ULRICK	KENTWA01													
MAPLE VALLEY	MPVYWAMV													
MERCER ISLAND	MRISWA01													
RENTON	RNTNWA01													
SEATTLE ATWATER	STTLWA05													
SEATTLE CAMPUS	STTLWACA													
SEATTLE CHERRY	STTLWACH													
SEATTLE DUMWAMISH	STTLWADU													
SEATTLE EAST	STTLWA03													
SEATTLE ELLIOTT	STTLWAEL													
SEATTLE EMERSON	STTLWA04													
SEATTLE LAKEVIEW	STTLWALA													
SEATTLE MAIN	STTLWA06													
SEATTLE PARKWAY	STTLWAPA													
SEATTLE SUNSET	STTLWASU													
SEATTLE WEST	STTLWAVE													
TOTALS - SEATTLE MSA														

Note 1: Consistent with the methodology ordered by the FCC in its TRRO, wholesale DS1 services are counted at full capacity of 24 DS0s and DS3 services are counted at full capacity of 672 DS0s. Unlike with other wholesale categories, Qwest has no way of determining whether UNE-L and EEL lines are used by the CLEC to serve business customers or residence customers. Because Qwest believes these lines are predominantly being used to serve business customers, they are accounted for in the Business Lines section of this analysis.

Note 2: Platform-based lines shown in this column include the sum of QPP, QLSP and UNE-P lines.